

Federal Communications Commission  
Washington, D.C.

March 22, 2000

**DOCKET FILE COPY ORIGINAL**

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Re: Acceptance of Motion As Timely Filed in (Docket No. 99-325)

The Office of the Secretary has received your request for acceptance of your pleading in the above-referenced proceeding as timely filed due to operational problems with the Electronic Comment Filing System (ECFS). Pursuant to 47 C.F.R. Section 0.231(I), the Secretary has reviewed your request and verified your assertions. After considering arguments, the Secretary has determined that this pleading will be accepted as timely filed.

However, Motions for Extensions of Time for the Reply Comment period are within the discretion of the bureau. We have forwarded your request in this regard to the

bureau for their consideration. If we can be of further assistance, please contact our office.

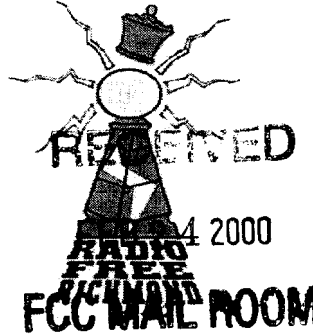
FEDERAL COMMUNICATIONS COMMISSION

*for William F. Carter*  
Magalie Roman Salas  
Secretary

Before the  
FEDERAL COMMUNICATIONS  
COMMISSION  
Washington, DC 20554

In the Matter of Digital Audio  
Broadcasting Systems and Their  
Impact On the Terrestrial Radio

MM Docket No. 99-325  
Broadcast Service.



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Secretary/Treasurer  
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**MOTION FOR EXTENSION OF REPLY-COMMENT PERIOD FOR 99-325  
DUE TO POSSIBLE COMPROMISE OF COMMENT PROCESS PURPOSE**

**Please Accept this motion as Accepted for Timely Filing**

Dear FCC Commissioners,

I understand that normally a request for an extension of a Comment-Reply period is expected seven days in advance of the deadline.

Unfortunately, we gave the ECFS system the benefit of the doubt and that did not pay off, we were never able to follow-up our research that required reading the Adobe Acrobat files from the organizations referenced in the other Motion for Extension we have filed with the Secretary of the FCC.

Additionally, following the 2/17/00 debate on HR3439 that concentrated on the alleged interference that the NAB and NPR maintain will be caused by the LPFM reducing the buffer from 600kHz to 400kHz ... the issue of interference possibly caused by 430kHz bandwidth hybrid IBOC DAB stations with only 170kHz buffers was not covered at all!

So that Friday a quick field test was performed and significant interference from the test IBOC station was recorded.

Furthermore, it turns out that the IBOC signals causing the recorded interference was the *most minimal* of the versions proposed by NAB, CEMA, Sony, etc.

This was all discovered last Friday. And so being just a volunteer citizen who has helped train people in Cable programming for years ... but is not paid to defend the interests of volunteer programmers of community media ... I fear that time simply ran out before we could assemble the resources needed for our defense.

**REASONING AND DETAIL BACKING UP THIS REQUEST  
FOR EXTENSION OF REPLY-COMMENT PERIOD FOR THREE MONTHS:**

The *purpose* of Comments and Reply-Comments is to get as much feedback on a proposed new set of regulations and technologies and services so that disaster is averted *before* a service is implemented. This purpose has been subverted by a test that only tests the *least* intrusive version of the proposal, rather than the *conservative* approach of testing the *most* intrusive version.

**Christopher Maxwell of the Virginia Center for the Public Press**

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Current IBOC-DAB field tests at WJFK 106.7FM are measuring the performance of a *proposed* 430kHz bandwidth service with a 70kHz test!

This is like testing a new race car at 25mph when people will be using it at 200mph.

A full test of the 430kHz bandwidth version of IBOC would in this case, spread WJFK's bandwidth from 106.6--106.8mHz *now* to a signal that will cover 106.485--106.915mHz.

*Already* two receivers (in this case, a handheld digitally tuned shortwave and Broadcast Band receiver and an automobile radio) in Northern Virginia or Southern DC attempting to tune in WWMX 106.5FM from Baltimore can pick up a distinct "buzz saw" noise from the IBOC digital carriers on WJFK 106.7FM. This 'buzz saw' interference was evident for about 20 *miles* around the WJFK antenna.

What will happen to listeners of Northern Va. WJFK and Washington D.C. WRQX 107.3FM if *both* stations are running 430kHz hybrid IBOC carriers? This would increase WRQX's signal bandwidth to 107.085--107.515. There would only be a buffer of 170kHz between the edges of their signals instead of the standard accepted 600kHz minimum buffer for full power stations.

Considering that opponents of LPFM have claimed that even the 400kHz buffer provided by the LPFM service rules is too small for a 100 Watt LPFM station to operate without interference, one has to wonder what happens with 20,000+ watt stations with only 170kHz of buffer!! A *full* test would confirm what would happen.

The Small Business Administration comments on 99-325 also recommend an *active* involvement of the public and the 95% of small business stations that may not realize what is at stake. An *ample advertising campaign* to the public to come and hear for themselves and comment on their experiences can head off adverse reactions later.

Thus the Reply-Comment period for Docket 99-325 should receive consideration to be extended at least three full months *during* a full test of WJFK *and* WRQX with the *full* proposed system in place.

Sincerely,  
Thank-you for your consideration of our concerns,  
Christopher Maxwell

